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THUNDER PROPERTIES, INC.
7 AND LVDG, LLC [SERIES 1101]

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 ***

11 BANK OF AMERICA, N.A., SUCCESSOR)
BY MERGER TO BAC HOME LOANS)
12 SERVICING, LP, F/K/A COUNTRYWIDE)
HOME LOANS SERVICING LP,)

Case No. 3:16-cv-00183-MMD-VPC

13 Plaintiff,)
14)

15 vs.)

16 SOUTHWEST MEADOWS; LVDG LLC)
A/K/A LVDG LLC SERIES 1101; THUNDER)
17 PROPERTIES, INC.; ALESSI & KOENIG,)
LLC,)

18 Defendants.)
19)

20 **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO**
MOTION FOR PARTIAL SUMMARY JUDGMENT
21 **(Third Request)**

22 COMES NOW Plaintiff, BANK OF AMERICA, N.A. ("*BANA*"), and Defendants,
23 THUNDER PROPERTIES, INC. ("*Thunder*") and LVDG, LLC [SERIES 1101] ("*LVDG*"), by
24 and through their undersigned counsel, and hereby stipulate and agree as follows:

- 25 1. On January 29, 2019, BANA filed and served its Motion for Partial Summary
26 Judgment [ECF No. 72] ("*Motion*"). A Response to said Motion was originally
27 due on February 19, 2019.
- 28 2. On February 19, 2019, the parties submitted a stipulation to extend the deadline to

1 respond to the Motion until March 8, 2019. [ECF #77]. Said Stipulation was
2 approved on the same date. [ECF #78].

3 3. On March 8, 2019, the parties submitted a second stipulation to extend the
4 deadline to respond to the Motion until March 25, 2019. [ECF #79]. On March
5 11, 2019, the Court entered a minute order granting the stipulation in part,
6 directing that a response be filed by March 19, 2019, and that a reply be filed by
7 March 26, 2019. [ECF #80].

8 4. On March 19, 2019, the courtroom administrator contacted the parties to schedule
9 a hearing of the Motion for Partial Summary Judgment.

10 5. Counsel for Thunder and LVDG has had a large number of work obligations to
11 attend to after having been out of the office for jury duty for several days. As a
12 result, counsel has not yet been able to complete the response to the Motion for
13 Partial Summary Judgment.

14 6. Based upon the foregoing, Thunder and LVDG have requested and shall be
15 granted an additional extension of time in which to file their Opposition to the
16 Motion for a single day until March 20, 2019. BANA will file its Reply as soon
17 as possible thereafter. The parties intend to have all briefing completed prior to
18 the hearing of the Motion.

19 7. This Stipulation is made in good faith and not for purpose of delay.

20 Dated this 19th day of March, 2019.

21 ROGER P. CROTEAU &
22 ASSOCIATES, LTD.

AKERMAN, LLP

23 /s/ Timothy E. Rhoda
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IT IS SO ORDERED.

By: 
Judge, U.S. District Court

Dated: March 20, 2019

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of March, 2019, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR PARTIAL SUMMARY JUDGMENT (Third Request)** to the following parties:

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